IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)) Case No. 4:20-cr-00418 JAR/NAF
WAIEL REBHI YAGHNAM,)))
Defendant.	,))

DEFENDANT WAIEL YAGHNAM'S OBJECTIONS TO FINAL PRESENTINENCE INVESTIGATION REPORT

COMES NOW Defendant, Waiel Rebhi Yaghnam, by and through undersigned counsel, and states his objection to the Final Presentence Investigation Report as follows:

- The Defendant adopts the objection of the Government as stated in their
 "Objection to the Final Presentence Investigation Report".
- 2. Paragraph 42: Waiel Yaghnam objects to the guideline calculation in this paragraph. The amount of potential loss was more than two hundred and fifty thousand dollars (\$250,000.00) but less than five hundred and fifty thousand (\$550,000.00). As a consequence, the guideline level should be twelve. This calculation will affect the total calculation outlined in paragraph 50 and reduce that calculation to a total offense level of 16.
- 3. <u>Paragraph 50</u>: For the reasons set forth above, the Defendant objects to the guideline calculation of 18 and asserts that the guideline calculation should be 16 based on the intended loss.

4. <u>Paragraph 54 and 56</u>: Defendant objects to the inclusion of these matters and believes that the criminal history category for the Defendant in paragraph 58 should be category 1.

WHEREFORE, Defendant states his objection to the Final Presentence Investigation Report.

Respectfully submitted,

BRUNTRAGER & BILLINGS, P.C.

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of November, 2022, the foregoing **Defendant**Waiel Yaghnam's Objections to Final Presentence Investigation Report was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager